

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

RODNEY JONES,

Plaintiff,

-against-

SEAN COMBS, JUSTIN DIOR COMBS,
CUBA GOODING, JR., LUCIAN
CHARLES GRAINGE, KRISTINA
KHORRAM, LOVE RECORDS, MOTOWN
RECORDS, UNIVERSAL MUSIC GROUP,
COMBS GLOBAL ENTERPRISES, JOHN
and JANE DOES 1-10, and ABC
CORPORATIONS 1-10,

Defendants.

Case No.: 24-cv-01457 (JPO)

**DEFENDANT KRISTINA
KHORRAM'S ANSWER TO
SECOND AMENDED COMPLAINT**

JURY TRIAL DEMANDED

Pursuant to Fed. R. Civ. P. 8(b), Defendant Kristina Khorram answers the Second Amended Complaint of Plaintiff Rodney Jones as follows:

1. Ms. Khorram admits that the Court has personal jurisdiction over her, but denies remaining allegations in Paragraph 1 to the extent they assert that she engaged in any conduct giving rise to liability under any cause of action. Ms. Khorram lacks knowledge or information sufficient to form a belief about the truth of the allegations pertaining to the other Defendants.

2. Ms. Khorram admits that the Court has personal jurisdiction over her, but denies remaining allegations in Paragraph 2 to the extent they assert that she engaged in any conduct giving rise to liability under any cause of action. Ms. Khorram lacks knowledge or information sufficient to form a belief about the truth of the allegations pertaining to the other Defendants.

3. Ms. Khorram denies the allegations in Paragraph 3 as they pertain to her. Ms. Khorram lacks knowledge or information sufficient to form a belief about the truth of the allegations pertaining to the other Defendants.

4. Ms. Khorram admits that the Court has personal jurisdiction over her, but denies the remaining allegations in Paragraph 4 as they pertain to her. Ms. Khorram lacks knowledge or information sufficient to form a belief about the truth of the allegations pertaining to the other Defendants.

5. Ms. Khorram admits that Mr. Jones is a music producer. Ms. Khorram lacks knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 5.

6. Ms. Khorram admits that “Defendant Sean Combs is a rapper and record executive popularly known by his stage names Puff Daddy, Puffy, P. Diddy, Diddy, Brother Love or Love. Mr. Combs became famous in the early 1990s with his record label Bad Boy Records. He rose to prominence in the music and entertainment industry over the decades and is regularly referred to as a hip-hop mogul.” Ms. Khorram further admits that Mr. Combs owns homes in California and Florida. Ms. Khorram lacks knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 6.

7. Ms. Khorram admits that Justin Combs is the son of Sean Combs and Misa Hylton, and that he was born in December 30, 1993. Ms. Khorram further admits that Justin Combs has resided in California. Ms. Khorram lacks knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 7.

8. Ms. Khorram admits that Mr. Grainge is the CEO of Universal Music Group. Ms. Khorram lacks knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 8.

9. Ms. Khorram admits that Cuba Gooding, Jr. is an actor. Ms. Khorram lacks knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 9.

10. Ms. Khorram admits that she was Mr. Combs' Chief of Staff on behalf of Combs Global (formerly Combs Enterprises), and that she is domiciled in California. Ms. Khorram denies the remaining allegations of Paragraph 10.

11. Ms. Khorram admits that Motown Records is a record label and that Ms. Habtemariam was its CEO. Ms. Khorram lacks knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 11.

12. Ms. Khorram admits that Universal Music Group is a record label, that Mr. Grange is its CEO, and that The Love Album was released on September 15, 2023. Ms. Khorram lacks knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 12.

13. Ms. Khorram admits that Love Records is a record label founded by Mr. Combs. Ms. Khorram lacks knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 13.

14. Ms. Khorram admits that Combs Global (formerly Combs Enterprises) at some point was involved with music, fashion, fragrance, beverage, marketing, film, television, and media properties. Ms. Khorram further admits that Combs Enterprises was once headquartered in New York, New York. Ms. Khorram lacks knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 14.

15. Ms. Khorram lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 15.

16. Ms. Khorram lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 16.

17. Ms. Khorram lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 17.

18. Ms. Khorram lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 18.

19. Ms. Khorram lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 19.

20. Ms. Khorram denies the allegations in Paragraph 20 as they pertain to her. Ms. Khorram lacks knowledge or information sufficient to form a belief about the truth of the allegations pertaining to the other Defendants.

21. Ms. Khorram lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 21.

22. Ms. Khorram lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 22.

23. Ms. Khorram admits that Mr. Jones was a producer on The Love Album. Ms. Khorram lacks knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 23.

24. Ms. Khorram admits that at some point Mr. Jones stayed at Mr. Combs' Miami residence during production of The Love Album. Ms. Khorram lacks knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 24.

25. Ms. Khorram admits that at some point Mr. Jones stayed at Mr. Combs' Miami residence during production of The Love Album, that Mr. Jones spent time on a yacht rented by

Mr. Combs in Saint Barthelemy, and that he traveled with Mr. Combs to New York City. Ms. Khorram lacks knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 25.

26. Ms. Khorram admits that Mr. Jones was a producer on The Love Album, and that he spent time with Mr. Combs outside the studio. Ms. Khorram lacks knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 26.

27. Ms. Khorram lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 27.

28. Ms. Khorram lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 28.

29. Ms. Khorram lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 29.

30. Ms. Khorram admits the allegations of Paragraph 30.

31. Ms. Khorram admits that Sean Combs and Justin Combs were present at the writers' camp. Ms. Khorram lacks knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 31.

32. Ms. Khorram lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 32.

33. Ms. Khorram admits that other musicians were present at the writers' camp. Ms. Khorram lacks knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 33.

34. Ms. Khorram lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 34.

35. Ms. Khorram lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 35.

36. Ms. Khorram lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 36.

37. Ms. Khorram lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 37.

38. Ms. Khorram lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 38.

39. Ms. Khorram lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 39.

40. Ms. Khorram lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 40.

41. Ms. Khorram lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 41.

42. Ms. Khorram lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 42.

43. Ms. Khorram lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 43.

44. Ms. Khorram lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 44.

45. Ms. Khorram lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 45.

46. Ms. Khorram lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 46.

47. Ms. Khorram lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 47.

48. Ms. Khorram lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 48.

49. Ms. Khorram lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 49.

50. Ms. Khorram admits that there was private security at the writers' camp. Ms. Khorram lacks knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 50.

51. Ms. Khorram lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 51.

52. Ms. Khorram lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 52.

53. Ms. Khorram lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 53.

54. Ms. Khorram lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 54.

55. Ms. Khorram lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 55.

56. Ms. Khorram lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 56.

57. Ms. Khorram lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 57.

58. Ms. Khorram admits the allegations in Paragraph 58.

59. Ms. Khorram admits that there is a door to Chalice Studios in the vicinity of the white van. Ms. Khorram lacks knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 59.

60. Ms. Khorram admits the allegations in Paragraph 60.

61. Ms. Khorram lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 61.

62. Ms. Khorram lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 62.

63. Ms. Khorram lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 63.

64. Ms. Khorram lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 64.

65. Ms. Khorram lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 65.

66. Ms. Khorram lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 66.

67. Ms. Khorram lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 67.

68. Ms. Khorram lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 68.

69. Ms. Khorram lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 69.

70. Ms. Khorram lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 70.

71. Ms. Khorram lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 71.

72. Ms. Khorram lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 72.

73. Ms. Khorram lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 73.

74. Ms. Khorram lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 74.

75. Ms. Khorram lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 75.

76. Ms. Khorram denies that Mr. Jones expressed any discomfort to her. Ms. Khorram lacks knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 76.

77. Ms. Khorram denies the allegations in Paragraph 77.

78. Ms. Khorram denies the allegations in Paragraph 78.

79. Ms. Khorram admits that if she was in a room and Mr. Combs ever began to disrobe to change or shower, she would leave the room. Ms. Khorram denies the remaining allegations in Paragraph 79.

80. Ms. Khorram denies that she aided and abetted any alleged misconduct, and that she “was working with Mr. Combs to groom [Mr. Jones] into accepting a homosexual relationship.” Ms. Khorram lacks knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 80.

81. Ms. Khorram denies the allegations of Paragraph 81 to the extent they are referencing the allegations against her in Paragraphs 76-80. Ms. Khorram lacks knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 81.

82. Ms. Khorram admits that Stevie J is a record producer. Ms. Khorram lacks knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 82.

83. Ms. Khorram admits that Stevie J is a record producer and television personality. Ms. Khorram lacks knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 83.

84. Ms. Khorram admits the allegations in Paragraph 84.

85. Ms. Khorram lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 85.

86. Ms. Khorram lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 86.

87. Ms. Khorram admits the allegations in Paragraph 87.

88. Ms. Khorram lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 88.

89. Ms. Khorram lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 89.

90. Ms. Khorram lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 90.

91. Ms. Khorram lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 91.

92. Ms. Khorram admits that Mr. Jones and Yung Miami were present at Mr. Combs' Miami residence on Thanksgiving 2022. Ms. Khorram lacks knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 92.

93. Ms. Khorram lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 93.

94. Ms. Khorram lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 94.

95. Ms. Khorram lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 95.

96. Ms. Khorram lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 96.

97. Ms. Khorram lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 97.

98. Ms. Khorram lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 98.

99. Ms. Khorram admits that Mr. Jones worked with Mr. Combs in California, New York, Florida and Saint Barthelemy. Ms. Khorram lacks knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 99.

100. Ms. Khorram lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 100.

101. Ms. Khorram lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 101.

102. Ms. Khorram lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 102.

103. Ms. Khorram lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 103.

104. Ms. Khorram lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 104.

105. Ms. Khorram lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 105.

106. Ms. Khorram lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 106.

107. Ms. Khorram lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 107.

108. Ms. Khorram lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 108.

109. Ms. Khorram lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 109.

110. Ms. Khorram lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 110.

111. Ms. Khorram lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 111.

112. Ms. Khorram lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 112.

113. Ms. Khorram lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 113.

114. Ms. Khorram lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 114.

115. Ms. Khorram lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 115.

116. Ms. Khorram admits that Mr. Combs had a party at his California home on or about July 2, 2023. Ms. Khorram lacks knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 116.

117. Ms. Khorram lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 117.

118. Ms. Khorram lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 118.

119. Ms. Khorram lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 119.

120. Ms. Khorram lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 120.

121. Ms. Khorram lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 121.

122. Ms. Khorram lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 122.

123. Ms. Khorram lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 123.

124. Ms. Khorram lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 124.

125. Ms. Khorram lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 125.

126. Ms. Khorram admits that Cuba Gooding Jr. was on Mr. Combs' yacht at some point. Ms. Khorram lacks knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 126.

127. Ms. Khorram lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 127.

128. Ms. Khorram lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 128.

129. Ms. Khorram lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 129.

130. Ms. Khorram lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 130.

131. Ms. Khorram lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 131.

132. Ms. Khorram lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 132.

133. Ms. Khorram lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 133.

134. Ms. Khorram lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 134.

135. Ms. Khorram lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 135.

136. Ms. Khorram lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 136.

137. Ms. Khorram lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 137.

138. Ms. Khorram lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 138.

139. Ms. Khorram lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 139.

140. Ms. Khorram admits that Mr. Jones went on social media asking for payment. Ms. Khorram lacks knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 140.

141. Ms. Khorram admits that Mr. Jones went on social media asking for payment. Ms. Khorram lacks knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 141.

142. Ms. Khorram admits the allegations in Paragraph 142.

143. Ms. Khorram lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 143.

144. Ms. Khorram lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 144.

145. Ms. Khorram lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 145.

146. Ms. Khorram lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 146.

147. Ms. Khorram lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 147.

148. Ms. Khorram admits that she read Ms. Ventura's Complaint when it hit the press and recalls that Ms. Ventura alleged in her lawsuit that Mr. Combs asked Ms. Ventura to carry a gun. Ms. Khorram lacks knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 148.

149. Ms. Khorram lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 149.

150. Ms. Khorram lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 150.

151. Ms. Khorram lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 151.

152. Ms. Khorram lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 152.

153. Ms. Khorram lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 153.

154. Ms. Khorram admits that Faheem Muhammad was Mr. Combs' head of security.

Ms. Khorram lacks knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 154.

155. Ms. Khorram lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 155.

156. Ms. Khorram lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 156.

157. Ms. Khorram lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 157.

158. Ms. Khorram lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 158.

159. Ms. Khorram lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 159.

160. Ms. Khorram admits that Ms. Habtemariam was the CEO of Motown Records.

Ms. Khorram lacks knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 160.

161. Ms. Khorram lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 161. The purported Habtemariam Declaration speaks for itself.

162. Ms. Khorram lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 162. The purported Habtemariam Declaration speaks for itself.

163. Ms. Khorram lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 163. The purported Habtemariam Declaration speaks for itself.

164. Ms. Khorram lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 164. The purported Habtemariam Declaration speaks for itself.

165. Ms. Khorram lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 165. The purported Habtemariam Declaration speaks for itself.

166. Ms. Khorram admits that Mr. Jones worked on The Love Album. Ms. Khorram lacks knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 166.

167. Ms. Khorram lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 167.

168. Ms. Khorram lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 168.

169. Ms. Khorram admits the allegations in Paragraph 169.

170. Ms. Khorram lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 170.

171. Ms. Khorram lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 171.

172. Ms. Khorram admits that Mr. Combs often wanted to set various moods for different meetings and events throughout the day. Ms. Khorram further admits the allegations in Paragraph 172a. Ms. Khorram denies that Mr. Combs instructed her to eliminate people from the studio if they refused to drink alcohol. Ms. Khorram lacks knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 172.

173. Ms. Khorram admits that Mr. Grainge was the CEO of Universal Music Group. Ms. Khorram lacks knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 173.

174. Ms. Khorram lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 174.

175. Ms. Khorram denies that she instructed her staff to lace champagne, DeLeon and Cîroc bottles with ecstasy and other drugs. Ms. Khorram lacks knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 175.

176. Ms. Khorram lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 176.

177. Ms. Khorram lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 177.

178. The allegations in this Paragraph relate to Mr. Jones' RICO claim, which the Court dismissed as to Ms. Khorram on March 24, 2025. Therefore, no response is required under Federal Rule of Civil Procedure 8(b)(1). Ms. Khorram reserves all rights, including the right to seek leave to amend this response, in the event it is nevertheless determined that her

response is required. In an abundance of caution, and solely to preserve all of Ms. Khorram's rights, Ms. Khorram does not intend by this response to admit any allegations and reserves the right to deny the allegations in this Paragraph or plead that she lacks knowledge or information sufficient to form a belief about the truth of the allegations.

179. The allegations in this Paragraph relate to Mr. Jones' RICO claim, which the Court dismissed as to Ms. Khorram on March 24, 2025. Therefore, no response is required under Federal Rule of Civil Procedure 8(b)(1). Ms. Khorram reserves all rights, including the right to seek leave to amend this response, in the event it is nevertheless determined that her response is required. In an abundance of caution, and solely to preserve all of Ms. Khorram's rights, Ms. Khorram does not intend by this response to admit any allegations and reserves the right to deny the allegations in this Paragraph or plead that she lacks knowledge or information sufficient to form a belief about the truth of the allegations.

180. The allegations in this Paragraph relate to Mr. Jones' RICO claim, which the Court dismissed as to Ms. Khorram on March 24, 2025. Therefore, no response is required under Federal Rule of Civil Procedure 8(b)(1). Ms. Khorram reserves all rights, including the right to seek leave to amend this response, in the event it is nevertheless determined that her response is required. In an abundance of caution, and solely to preserve all of Ms. Khorram's rights, Ms. Khorram does not intend by this response to admit any allegations and reserves the right to deny the allegations in this Paragraph or plead that she lacks knowledge or information sufficient to form a belief about the truth of the allegations.

181. Ms. Khorram admits that during a studio session with a female singer, Ms. Khorram sent Mr. Jones a text message on April 6, 2023 at Mr. Combs' behest, stating that Mr.

Combs said this is not the same female vocalist who had previously come into the studio to record vocals for a song. Ms. Khorram denies the remaining allegations in Paragraph 181.

182. The allegations in this Paragraph relate to Mr. Jones' RICO claim, which the Court dismissed as to Ms. Khorram on March 24, 2025. Therefore, no response is required under Federal Rule of Civil Procedure 8(b)(1). Ms. Khorram reserves all rights, including the right to seek leave to amend this response, in the event it is nevertheless determined that her response is required. In an abundance of caution, and solely to preserve all of Ms. Khorram's rights, Ms. Khorram does not intend by this response to admit any allegations and reserves the right to deny the allegations in this Paragraph or plead that she lacks knowledge or information sufficient to form a belief about the truth of the allegations.

183. The allegations in this Paragraph relate to Mr. Jones' RICO claim, which the Court dismissed as to Ms. Khorram on March 24, 2025. Therefore, no response is required under Federal Rule of Civil Procedure 8(b)(1). Ms. Khorram reserves all rights, including the right to seek leave to amend this response, in the event it is nevertheless determined that her response is required. In an abundance of caution, and solely to preserve all of Ms. Khorram's rights, Ms. Khorram does not intend by this response to admit any allegations and reserves the right to deny the allegations in this Paragraph or plead that she lacks knowledge or information sufficient to form a belief about the truth of the allegations.

184. Ms. Khorram denies the allegations in Paragraph 184.

185. Ms. Khorram admits that Frankie Santella was Vice President of Music Management & Strategic Partnerships for Combs Global. Some of the allegations in this Paragraph relate to Mr. Jones' RICO claim, which the Court dismissed as to Ms. Khorram on March 24, 2025. Therefore, no response to those allegations is required under Federal Rule of

Civil Procedure 8(b)(1). Ms. Khorram reserves all rights, including the right to seek leave to amend this response, in the event it is nevertheless determined that her response is required. In an abundance of caution, and solely to preserve all of Ms. Khorram's rights, Ms. Khorram does not intend by this response to admit any allegations and reserves the right to deny the allegations in this Paragraph relating to the RICO claim or plead that she lacks knowledge or information sufficient to form a belief about the truth of such allegations. Ms. Khorram denies the remaining allegations in Paragraph 185.

186. Ms. Khorram lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 186.

187. Some of the allegations in this Paragraph relate to Mr. Jones' RICO claim, which the Court dismissed as to Ms. Khorram on March 24, 2025. Therefore, no response to those allegations is required under Federal Rule of Civil Procedure 8(b)(1). Ms. Khorram reserves all rights, including the right to seek leave to amend this response, in the event it is nevertheless determined that her response is required. In an abundance of caution, and solely to preserve all of Ms. Khorram's rights, Ms. Khorram does not intend by this response to admit any allegations and reserves the right to deny the allegations in this Paragraph relating to the RICO claim or plead that she lacks knowledge or information sufficient to form a belief about the truth of such allegations. Ms. Khorram denies the remaining allegations in Paragraph 187 as they pertain to her. Ms. Khorram lacks knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 187 as they pertain to the other Defendants.

188. Some of the allegations in this Paragraph relate to Mr. Jones' RICO claim, which the Court dismissed as to Ms. Khorram on March 24, 2025. Therefore, no response to those allegations is required under Federal Rule of Civil Procedure 8(b)(1). Ms. Khorram reserves all

rights, including the right to seek leave to amend this response, in the event it is nevertheless determined that her response is required. In an abundance of caution, and solely to preserve all of Ms. Khorram's rights, Ms. Khorram does not intend by this response to admit any allegations and reserves the right to deny the allegations in this Paragraph relating to the RICO claim or plead that she lacks knowledge or information sufficient to form a belief about the truth of such allegations. Ms. Khorram denies the remaining allegations in Paragraph 188 as they pertain to her. Ms. Khorram lacks knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 188 as they pertain to the other Defendants.

189. Some of the allegations in this Paragraph relate to Mr. Jones' RICO claim, which the Court dismissed as to Ms. Khorram on March 24, 2025. Therefore, no response to those allegations is required under Federal Rule of Civil Procedure 8(b)(1). Ms. Khorram reserves all rights, including the right to seek leave to amend this response, in the event it is nevertheless determined that her response is required. In an abundance of caution, and solely to preserve all of Ms. Khorram's rights, Ms. Khorram does not intend by this response to admit any allegations and reserves the right to deny the allegations in this Paragraph relating to the RICO claim or plead that she lacks knowledge or information sufficient to form a belief about the truth of such allegations. Ms. Khorram denies the remaining allegations in Paragraph 189 as they pertain to her. Ms. Khorram lacks knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 189 as they pertain to the other Defendants.

190. Ms. Khorram lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 190.

191. Ms. Khorram lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 191.

192. Ms. Khorram lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 192.

193. Ms. Khorram lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 193.

194. Ms. Khorram admits that Jose Cruz was the IT director for Combs Global and that he had access to video footage of Mr. Combs. Ms. Khorram lacks knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 194.

195. Ms. Khorram lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 195.

196. Ms. Khorram admits that Matt Testa worked as an engineer for Mr. Combs, and that Russell Greene is a private investigator. Ms. Khorram lacks knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 196.

197. Ms. Khorram lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 197.

198. Ms. Khorram lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 198.

199. Some of the allegations in this Paragraph relate to Mr. Jones' RICO claim, which the Court dismissed as to Ms. Khorram on March 24, 2025. Therefore, no response to those allegations is required under Federal Rule of Civil Procedure 8(b)(1). Ms. Khorram reserves all rights, including the right to seek leave to amend this response, in the event it is nevertheless determined that her response is required. In an abundance of caution, and solely to preserve all of Ms. Khorram's rights, Ms. Khorram does not intend by this response to admit any allegations and reserves the right to deny the allegations in this Paragraph relating to the RICO claim or

plead that she lacks knowledge or information sufficient to form a belief about the truth of such allegations. Ms. Khorram denies the remaining allegations in Paragraph 199 as they pertain to her. Ms. Khorram lacks knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 199 as they pertain to the other Defendants.

200. Ms. Khorram lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 200.

201. Ms. Khorram incorporates her responses in each of the preceding paragraphs of this Answer.

202. The allegations in this Paragraph relate to Mr. Jones' RICO claim, which the Court dismissed as to Ms. Khorram on March 24, 2025. Therefore, no response to those allegations is required under Federal Rule of Civil Procedure 8(b)(1). Ms. Khorram reserves all rights, including the right to seek leave to amend this response, in the event it is nevertheless determined that her response is required. In an abundance of caution, and solely to preserve all of Ms. Khorram's rights, Ms. Khorram does not intend by this response to admit any allegations and reserves the right to deny the allegations in this Paragraph or plead that she lacks knowledge or information sufficient to form a belief about the truth of such allegations.

203. The allegations in this Paragraph relate to Mr. Jones' RICO claim, which the Court dismissed as to Ms. Khorram on March 24, 2025. Therefore, no response to those allegations is required under Federal Rule of Civil Procedure 8(b)(1). Ms. Khorram reserves all rights, including the right to seek leave to amend this response, in the event it is nevertheless determined that her response is required. In an abundance of caution, and solely to preserve all of Ms. Khorram's rights, Ms. Khorram does not intend by this response to admit any allegations

and reserves the right to deny the allegations in this Paragraph or plead that she lacks knowledge or information sufficient to form a belief about the truth of such allegations.

204. The allegations in this Paragraph relate to Mr. Jones' RICO claim, which the Court dismissed as to Ms. Khorram on March 24, 2025. Therefore, no response to those allegations is required under Federal Rule of Civil Procedure 8(b)(1). Ms. Khorram reserves all rights, including the right to seek leave to amend this response, in the event it is nevertheless determined that her response is required. In an abundance of caution, and solely to preserve all of Ms. Khorram's rights, Ms. Khorram does not intend by this response to admit any allegations and reserves the right to deny the allegations in this Paragraph or plead that she lacks knowledge or information sufficient to form a belief about the truth of such allegations.

205. The allegations in this Paragraph relate to Mr. Jones' RICO claim, which the Court dismissed as to Ms. Khorram on March 24, 2025. Therefore, no response to those allegations is required under Federal Rule of Civil Procedure 8(b)(1). Ms. Khorram reserves all rights, including the right to seek leave to amend this response, in the event it is nevertheless determined that her response is required. In an abundance of caution, and solely to preserve all of Ms. Khorram's rights, Ms. Khorram does not intend by this response to admit any allegations and reserves the right to deny the allegations in this Paragraph or plead that she lacks knowledge or information sufficient to form a belief about the truth of such allegations.

206. The allegations in this Paragraph relate to Mr. Jones' RICO claim, which the Court dismissed as to Ms. Khorram on March 24, 2025. Therefore, no response to those allegations is required under Federal Rule of Civil Procedure 8(b)(1). Ms. Khorram reserves all rights, including the right to seek leave to amend this response, in the event it is nevertheless determined that her response is required. In an abundance of caution, and solely to preserve all

of Ms. Khorram's rights, Ms. Khorram does not intend by this response to admit any allegations and reserves the right to deny the allegations in this Paragraph or plead that she lacks knowledge or information sufficient to form a belief about the truth of such allegations.

207. The allegations in this Paragraph relate to Mr. Jones' RICO claim, which the Court dismissed as to Ms. Khorram on March 24, 2025. Therefore, no response to those allegations is required under Federal Rule of Civil Procedure 8(b)(1). Ms. Khorram reserves all rights, including the right to seek leave to amend this response, in the event it is nevertheless determined that her response is required. In an abundance of caution, and solely to preserve all of Ms. Khorram's rights, Ms. Khorram does not intend by this response to admit any allegations and reserves the right to deny the allegations in this Paragraph or plead that she lacks knowledge or information sufficient to form a belief about the truth of such allegations.

208. The allegations in this Paragraph relate to Mr. Jones' RICO claim, which the Court dismissed as to Ms. Khorram on March 24, 2025. Therefore, no response to those allegations is required under Federal Rule of Civil Procedure 8(b)(1). Ms. Khorram reserves all rights, including the right to seek leave to amend this response, in the event it is nevertheless determined that her response is required. In an abundance of caution, and solely to preserve all of Ms. Khorram's rights, Ms. Khorram does not intend by this response to admit any allegations and reserves the right to deny the allegations in this Paragraph or plead that she lacks knowledge or information sufficient to form a belief about the truth of such allegations.

209. The allegations in this Paragraph relate to Mr. Jones' RICO claim, which the Court dismissed as to Ms. Khorram on March 24, 2025. Therefore, no response to those allegations is required under Federal Rule of Civil Procedure 8(b)(1). Ms. Khorram reserves all rights, including the right to seek leave to amend this response, in the event it is nevertheless

determined that her response is required. In an abundance of caution, and solely to preserve all of Ms. Khorram's rights, Ms. Khorram does not intend by this response to admit any allegations and reserves the right to deny the allegations in this Paragraph or plead that she lacks knowledge or information sufficient to form a belief about the truth of such allegations.

210. The allegations in this Paragraph relate to Mr. Jones' RICO claim, which the Court dismissed as to Ms. Khorram on March 24, 2025. Therefore, no response to those allegations is required under Federal Rule of Civil Procedure 8(b)(1). Ms. Khorram reserves all rights, including the right to seek leave to amend this response, in the event it is nevertheless determined that her response is required. In an abundance of caution, and solely to preserve all of Ms. Khorram's rights, Ms. Khorram does not intend by this response to admit any allegations and reserves the right to deny the allegations in this Paragraph or plead that she lacks knowledge or information sufficient to form a belief about the truth of such allegations.

211. The allegations in this Paragraph relate to Mr. Jones' RICO claim, which the Court dismissed as to Ms. Khorram on March 24, 2025. Therefore, no response to those allegations is required under Federal Rule of Civil Procedure 8(b)(1). Ms. Khorram reserves all rights, including the right to seek leave to amend this response, in the event it is nevertheless determined that her response is required. In an abundance of caution, and solely to preserve all of Ms. Khorram's rights, Ms. Khorram does not intend by this response to admit any allegations and reserves the right to deny the allegations in this Paragraph or plead that she lacks knowledge or information sufficient to form a belief about the truth of such allegations.

212. Some of the allegations in this Paragraph relate to Mr. Jones' RICO claim, which the Court dismissed as to Ms. Khorram on March 24, 2025. Therefore, no response to those allegations is required under Federal Rule of Civil Procedure 8(b)(1). Ms. Khorram reserves all

rights, including the right to seek leave to amend this response, in the event it is nevertheless determined that her response is required. In an abundance of caution, and solely to preserve all of Ms. Khorram's rights, Ms. Khorram does not intend by this response to admit any allegations and reserves the right to deny the allegations in this Paragraph relating to the RICO claim or plead that she lacks knowledge or information sufficient to form a belief about the truth of such allegations. Ms. Khorram denies the remaining allegations in Paragraph 212 as they pertain to her. Ms. Khorram lacks knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 212 as they pertain to the other Defendants.

213. The allegations in this Paragraph relate to Mr. Jones' RICO claim, which the Court dismissed as to Ms. Khorram on March 24, 2025. Therefore, no response to those allegations is required under Federal Rule of Civil Procedure 8(b)(1). Ms. Khorram reserves all rights, including the right to seek leave to amend this response, in the event it is nevertheless determined that her response is required. In an abundance of caution, and solely to preserve all of Ms. Khorram's rights, Ms. Khorram does not intend by this response to admit any allegations and reserves the right to deny the allegations in this Paragraph or plead that she lacks knowledge or information sufficient to form a belief about the truth of such allegations.

214. The allegations in this Paragraph relate to Mr. Jones' RICO claim, which the Court dismissed as to Ms. Khorram on March 24, 2025. Therefore, no response to those allegations is required under Federal Rule of Civil Procedure 8(b)(1). Ms. Khorram reserves all rights, including the right to seek leave to amend this response, in the event it is nevertheless determined that her response is required. In an abundance of caution, and solely to preserve all of Ms. Khorram's rights, Ms. Khorram does not intend by this response to admit any allegations

and reserves the right to deny the allegations in this Paragraph or plead that she lacks knowledge or information sufficient to form a belief about the truth of such allegations.

215. Some of the allegations in this Paragraph relate to Mr. Jones' RICO claim, which the Court dismissed as to Ms. Khorram on March 24, 2025. Therefore, no response to those allegations is required under Federal Rule of Civil Procedure 8(b)(1). Ms. Khorram reserves all rights, including the right to seek leave to amend this response, in the event it is nevertheless determined that her response is required. In an abundance of caution, and solely to preserve all of Ms. Khorram's rights, Ms. Khorram does not intend by this response to admit any allegations and reserves the right to deny the allegations in this Paragraph relating to the RICO claim or plead that she lacks knowledge or information sufficient to form a belief about the truth of such allegations. Ms. Khorram denies the remaining allegations in Paragraph 215 as they pertain to her. Ms. Khorram lacks knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 215 as they pertain to the other Defendants.

216. The allegations in this Paragraph relate to Mr. Jones' RICO claim, which the Court dismissed as to Ms. Khorram on March 24, 2025. Therefore, no response to those allegations is required under Federal Rule of Civil Procedure 8(b)(1). Ms. Khorram reserves all rights, including the right to seek leave to amend this response, in the event it is nevertheless determined that her response is required. In an abundance of caution, and solely to preserve all of Ms. Khorram's rights, Ms. Khorram does not intend by this response to admit any allegations and reserves the right to deny the allegations in this Paragraph or plead that she lacks knowledge or information sufficient to form a belief about the truth of such allegations.

217. The allegations in this Paragraph relate to Mr. Jones' RICO claim, which the Court dismissed as to Ms. Khorram on March 24, 2025. Therefore, no response to those

allegations is required under Federal Rule of Civil Procedure 8(b)(1). Ms. Khorram reserves all rights, including the right to seek leave to amend this response, in the event it is nevertheless determined that her response is required. In an abundance of caution, and solely to preserve all of Ms. Khorram's rights, Ms. Khorram does not intend by this response to admit any allegations and reserves the right to deny the allegations in this Paragraph or plead that she lacks knowledge or information sufficient to form a belief about the truth of such allegations.

218. The allegations in this Paragraph relate to Mr. Jones' RICO claim, which the Court dismissed as to Ms. Khorram on March 24, 2025. Therefore, no response to those allegations is required under Federal Rule of Civil Procedure 8(b)(1). Ms. Khorram reserves all rights, including the right to seek leave to amend this response, in the event it is nevertheless determined that her response is required. In an abundance of caution, and solely to preserve all of Ms. Khorram's rights, Ms. Khorram does not intend by this response to admit any allegations and reserves the right to deny the allegations in this Paragraph or plead that she lacks knowledge or information sufficient to form a belief about the truth of such allegations.

219. Some of the allegations in this Paragraph relate to Mr. Jones' RICO claim, which the Court dismissed as to Ms. Khorram on March 24, 2025. Therefore, no response to those allegations is required under Federal Rule of Civil Procedure 8(b)(1). Ms. Khorram reserves all rights, including the right to seek leave to amend this response, in the event it is nevertheless determined that her response is required. In an abundance of caution, and solely to preserve all of Ms. Khorram's rights, Ms. Khorram does not intend by this response to admit any allegations and reserves the right to deny the allegations in this Paragraph relating to the RICO claim or plead that she lacks knowledge or information sufficient to form a belief about the truth of such allegations. Ms. Khorram denies the remaining allegations in Paragraph 219 as they pertain to

her. Ms. Khorram lacks knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 219 as they pertain to the other Defendants.

220. The allegations in this Paragraph relate to Mr. Jones' RICO claim, which the Court dismissed as to Ms. Khorram on March 24, 2025. Therefore, no response to those allegations is required under Federal Rule of Civil Procedure 8(b)(1). Ms. Khorram reserves all rights, including the right to seek leave to amend this response, in the event it is nevertheless determined that her response is required. In an abundance of caution, and solely to preserve all of Ms. Khorram's rights, Ms. Khorram does not intend by this response to admit any allegations and reserves the right to deny the allegations in this Paragraph or plead that she lacks knowledge or information sufficient to form a belief about the truth of such allegations.

221. The allegations in this Paragraph relate to Mr. Jones' RICO claim, which the Court dismissed as to Ms. Khorram on March 24, 2025. Therefore, no response to those allegations is required under Federal Rule of Civil Procedure 8(b)(1). Ms. Khorram reserves all rights, including the right to seek leave to amend this response, in the event it is nevertheless determined that her response is required. In an abundance of caution, and solely to preserve all of Ms. Khorram's rights, Ms. Khorram does not intend by this response to admit any allegations and reserves the right to deny the allegations in this Paragraph or plead that she lacks knowledge or information sufficient to form a belief about the truth of such allegations.

222. Some of the allegations in this Paragraph relate to Mr. Jones' RICO claim, which the Court dismissed as to Ms. Khorram on March 24, 2025. Therefore, no response to those allegations is required under Federal Rule of Civil Procedure 8(b)(1). Ms. Khorram reserves all rights, including the right to seek leave to amend this response, in the event it is nevertheless determined that her response is required. In an abundance of caution, and solely to preserve all

of Ms. Khorram's rights, Ms. Khorram does not intend by this response to admit any allegations and reserves the right to deny the allegations in this Paragraph relating to the RICO claim or plead that she lacks knowledge or information sufficient to form a belief about the truth of such allegations. Ms. Khorram denies the remaining allegations in Paragraph 222 as they pertain to her. Ms. Khorram lacks knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 222 as they pertain to the other Defendants.

223. Some of the allegations in this Paragraph relate to Mr. Jones' RICO claim, which the Court dismissed as to Ms. Khorram on March 24, 2025. Therefore, no response to those allegations is required under Federal Rule of Civil Procedure 8(b)(1). Ms. Khorram reserves all rights, including the right to seek leave to amend this response, in the event it is nevertheless determined that her response is required. In an abundance of caution, and solely to preserve all of Ms. Khorram's rights, Ms. Khorram does not intend by this response to admit any allegations and reserves the right to deny the allegations in this Paragraph relating to the RICO claim or plead that she lacks knowledge or information sufficient to form a belief about the truth of such allegations. Ms. Khorram denies the remaining allegations in Paragraph 223 as they pertain to her. Ms. Khorram lacks knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 223 as they pertain to the other Defendants.

224. Some of the allegations in this Paragraph relate to Mr. Jones' RICO claim, which the Court dismissed as to Ms. Khorram on March 24, 2025. Therefore, no response to those allegations is required under Federal Rule of Civil Procedure 8(b)(1). Ms. Khorram reserves all rights, including the right to seek leave to amend this response, in the event it is nevertheless determined that her response is required. In an abundance of caution, and solely to preserve all of Ms. Khorram's rights, Ms. Khorram does not intend by this response to admit any allegations

and reserves the right to deny the allegations in this Paragraph relating to the RICO claim or plead that she lacks knowledge or information sufficient to form a belief about the truth of such allegations. Ms. Khorram denies the remaining allegations in Paragraph 224 as they pertain to her. Ms. Khorram lacks knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 224 as they pertain to the other Defendants.

225. The allegations in this Paragraph relate to Mr. Jones' RICO claim, which the Court dismissed as to Ms. Khorram on March 24, 2025. Therefore, no response to those allegations is required under Federal Rule of Civil Procedure 8(b)(1). Ms. Khorram reserves all rights, including the right to seek leave to amend this response, in the event it is nevertheless determined that her response is required. In an abundance of caution, and solely to preserve all of Ms. Khorram's rights, Ms. Khorram does not intend by this response to admit any allegations and reserves the right to deny the allegations in this Paragraph or plead that she lacks knowledge or information sufficient to form a belief about the truth of such allegations.

226. Some of the allegations in this Paragraph relate to Mr. Jones' RICO claim, which the Court dismissed as to Ms. Khorram on March 24, 2025. Therefore, no response to those allegations is required under Federal Rule of Civil Procedure 8(b)(1). Ms. Khorram reserves all rights, including the right to seek leave to amend this response, in the event it is nevertheless determined that her response is required. In an abundance of caution, and solely to preserve all of Ms. Khorram's rights, Ms. Khorram does not intend by this response to admit any allegations and reserves the right to deny the allegations in this Paragraph relating to the RICO claim or plead that she lacks knowledge or information sufficient to form a belief about the truth of such allegations. Ms. Khorram denies the remaining allegations in Paragraph 226 as they pertain to

her. Ms. Khorram lacks knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 226 as they pertain to the other Defendants.

227. Some of the allegations in this Paragraph relate to Mr. Jones' RICO claim, which the Court dismissed as to Ms. Khorram on March 24, 2025. Therefore, no response to those allegations is required under Federal Rule of Civil Procedure 8(b)(1). Ms. Khorram reserves all rights, including the right to seek leave to amend this response, in the event it is nevertheless determined that her response is required. In an abundance of caution, and solely to preserve all of Ms. Khorram's rights, Ms. Khorram does not intend by this response to admit any allegations and reserves the right to deny the allegations in this Paragraph relating to the RICO claim or plead that she lacks knowledge or information sufficient to form a belief about the truth of such allegations. Ms. Khorram denies the remaining allegations in Paragraph 227 as they pertain to her. Ms. Khorram lacks knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 227 as they pertain to the other Defendants.

228. The allegations in this Paragraph relate to Mr. Jones' RICO claim, which the Court dismissed as to Ms. Khorram on March 24, 2025. Therefore, no response to those allegations is required under Federal Rule of Civil Procedure 8(b)(1). Ms. Khorram reserves all rights, including the right to seek leave to amend this response, in the event it is nevertheless determined that her response is required. In an abundance of caution, and solely to preserve all of Ms. Khorram's rights, Ms. Khorram does not intend by this response to admit any allegations and reserves the right to deny the allegations in this Paragraph or plead that she lacks knowledge or information sufficient to form a belief about the truth of such allegations.

229. The allegations in this Paragraph relate to Mr. Jones' RICO claim, which the Court dismissed as to Ms. Khorram on March 24, 2025. Therefore, no response to those

allegations is required under Federal Rule of Civil Procedure 8(b)(1). Ms. Khorram reserves all rights, including the right to seek leave to amend this response, in the event it is nevertheless determined that her response is required. In an abundance of caution, and solely to preserve all of Ms. Khorram's rights, Ms. Khorram does not intend by this response to admit any allegations and reserves the right to deny the allegations in this Paragraph or plead that she lacks knowledge or information sufficient to form a belief about the truth of such allegations.

230. The allegations in this Paragraph relate to Mr. Jones' RICO claim, which the Court dismissed as to Ms. Khorram on March 24, 2025. Therefore, no response to those allegations is required under Federal Rule of Civil Procedure 8(b)(1). Ms. Khorram reserves all rights, including the right to seek leave to amend this response, in the event it is nevertheless determined that her response is required. In an abundance of caution, and solely to preserve all of Ms. Khorram's rights, Ms. Khorram does not intend by this response to admit any allegations and reserves the right to deny the allegations in this Paragraph or plead that she lacks knowledge or information sufficient to form a belief about the truth of such allegations.

231. Some of the allegations in this Paragraph relate to Mr. Jones' RICO claim, which the Court dismissed as to Ms. Khorram on March 24, 2025. Therefore, no response to those allegations is required under Federal Rule of Civil Procedure 8(b)(1). Ms. Khorram reserves all rights, including the right to seek leave to amend this response, in the event it is nevertheless determined that her response is required. In an abundance of caution, and solely to preserve all of Ms. Khorram's rights, Ms. Khorram does not intend by this response to admit any allegations and reserves the right to deny the allegations in this Paragraph relating to the RICO claim or plead that she lacks knowledge or information sufficient to form a belief about the truth of such allegations. Ms. Khorram denies the remaining allegations in Paragraph 231 as they pertain to

her. Ms. Khorram lacks knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 231 as they pertain to the other Defendants.

232. Some of the allegations in this Paragraph relate to Mr. Jones' RICO claim, which the Court dismissed as to Ms. Khorram on March 24, 2025. Therefore, no response to those allegations is required under Federal Rule of Civil Procedure 8(b)(1). Ms. Khorram reserves all rights, including the right to seek leave to amend this response, in the event it is nevertheless determined that her response is required. In an abundance of caution, and solely to preserve all of Ms. Khorram's rights, Ms. Khorram does not intend by this response to admit any allegations and reserves the right to deny the allegations in this Paragraph relating to the RICO claim or plead that she lacks knowledge or information sufficient to form a belief about the truth of such allegations. Ms. Khorram denies the remaining allegations in Paragraph 232 as they pertain to her. Ms. Khorram lacks knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 232 as they pertain to the other Defendants.

233. Some of the allegations in this Paragraph relate to Mr. Jones' RICO claim, which the Court dismissed as to Ms. Khorram on March 24, 2025. Therefore, no response to those allegations is required under Federal Rule of Civil Procedure 8(b)(1). Ms. Khorram reserves all rights, including the right to seek leave to amend this response, in the event it is nevertheless determined that her response is required. In an abundance of caution, and solely to preserve all of Ms. Khorram's rights, Ms. Khorram does not intend by this response to admit any allegations and reserves the right to deny the allegations in this Paragraph relating to the RICO claim or plead that she lacks knowledge or information sufficient to form a belief about the truth of such allegations. Ms. Khorram denies the remaining allegations in Paragraph 233 as they pertain to

her. Ms. Khorram lacks knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 233 as they pertain to the other Defendants.

234. Some of the allegations in this Paragraph relate to Mr. Jones' RICO claim, which the Court dismissed as to Ms. Khorram on March 24, 2025. Therefore, no response to those allegations is required under Federal Rule of Civil Procedure 8(b)(1). Ms. Khorram reserves all rights, including the right to seek leave to amend this response, in the event it is nevertheless determined that her response is required. In an abundance of caution, and solely to preserve all of Ms. Khorram's rights, Ms. Khorram does not intend by this response to admit any allegations and reserves the right to deny the allegations in this Paragraph relating to the RICO claim or plead that she lacks knowledge or information sufficient to form a belief about the truth of such allegations. Ms. Khorram denies the remaining allegations in Paragraph 234 as they pertain to her. Ms. Khorram lacks knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 234 as they pertain to the other Defendants.

235. The allegations in this Paragraph relate to Mr. Jones' RICO claim, which the Court dismissed as to Ms. Khorram on March 24, 2025. Therefore, no response to those allegations is required under Federal Rule of Civil Procedure 8(b)(1). Ms. Khorram reserves all rights, including the right to seek leave to amend this response, in the event it is nevertheless determined that her response is required. In an abundance of caution, and solely to preserve all of Ms. Khorram's rights, Ms. Khorram does not intend by this response to admit any allegations and reserves the right to deny the allegations in this Paragraph or plead that she lacks knowledge or information sufficient to form a belief about the truth of such allegations.

236. The allegations in this Paragraph relate to Mr. Jones' RICO claim, which the Court dismissed as to Ms. Khorram on March 24, 2025. Therefore, no response to those

allegations is required under Federal Rule of Civil Procedure 8(b)(1). Ms. Khorram reserves all rights, including the right to seek leave to amend this response, in the event it is nevertheless determined that her response is required. In an abundance of caution, and solely to preserve all of Ms. Khorram's rights, Ms. Khorram does not intend by this response to admit any allegations and reserves the right to deny the allegations in this Paragraph or plead that she lacks knowledge or information sufficient to form a belief about the truth of such allegations.

237. The allegations in this Paragraph relate to Mr. Jones' RICO claim, which the Court dismissed as to Ms. Khorram on March 24, 2025. Therefore, no response to those allegations is required under Federal Rule of Civil Procedure 8(b)(1). Ms. Khorram reserves all rights, including the right to seek leave to amend this response, in the event it is nevertheless determined that her response is required. In an abundance of caution, and solely to preserve all of Ms. Khorram's rights, Ms. Khorram does not intend by this response to admit any allegations and reserves the right to deny the allegations in this Paragraph or plead that she lacks knowledge or information sufficient to form a belief about the truth of such allegations.

238. The allegations in this Paragraph relate to Mr. Jones' RICO claim, which the Court dismissed as to Ms. Khorram on March 24, 2025. Therefore, no response to those allegations is required under Federal Rule of Civil Procedure 8(b)(1). Ms. Khorram reserves all rights, including the right to seek leave to amend this response, in the event it is nevertheless determined that her response is required. In an abundance of caution, and solely to preserve all of Ms. Khorram's rights, Ms. Khorram does not intend by this response to admit any allegations and reserves the right to deny the allegations in this Paragraph or plead that she lacks knowledge or information sufficient to form a belief about the truth of such allegations.

239. Some of the allegations in this Paragraph relate to Mr. Jones' RICO claim, which the Court dismissed as to Ms. Khorram on March 24, 2025. Therefore, no response to those allegations is required under Federal Rule of Civil Procedure 8(b)(1). Ms. Khorram reserves all rights, including the right to seek leave to amend this response, in the event it is nevertheless determined that her response is required. In an abundance of caution, and solely to preserve all of Ms. Khorram's rights, Ms. Khorram does not intend by this response to admit any allegations and reserves the right to deny the allegations in this Paragraph relating to the RICO claim or plead that she lacks knowledge or information sufficient to form a belief about the truth of such allegations. Ms. Khorram denies the remaining allegations in Paragraph 239 as they pertain to her. Ms. Khorram lacks knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 239 as they pertain to the other Defendants.

240. Some of the allegations in this Paragraph relate to Mr. Jones' RICO claim, which the Court dismissed as to Ms. Khorram on March 24, 2025. Therefore, no response to those allegations is required under Federal Rule of Civil Procedure 8(b)(1). Ms. Khorram reserves all rights, including the right to seek leave to amend this response, in the event it is nevertheless determined that her response is required. In an abundance of caution, and solely to preserve all of Ms. Khorram's rights, Ms. Khorram does not intend by this response to admit any allegations and reserves the right to deny the allegations in this Paragraph relating to the RICO claim or plead that she lacks knowledge or information sufficient to form a belief about the truth of such allegations. Ms. Khorram denies the remaining allegations in Paragraph 240 as they pertain to her. Ms. Khorram lacks knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 240 as they pertain to the other Defendants.

241. The allegations in this Paragraph relate to Mr. Jones' RICO claim, which the Court dismissed as to Ms. Khorram on March 24, 2025. Therefore, no response to those allegations is required under Federal Rule of Civil Procedure 8(b)(1). Ms. Khorram reserves all rights, including the right to seek leave to amend this response, in the event it is nevertheless determined that her response is required. In an abundance of caution, and solely to preserve all of Ms. Khorram's rights, Ms. Khorram does not intend by this response to admit any allegations and reserves the right to deny the allegations in this Paragraph or plead that she lacks knowledge or information sufficient to form a belief about the truth of such allegations.

242. The allegations in this Paragraph relate to Mr. Jones' RICO claim, which the Court dismissed as to Ms. Khorram on March 24, 2025. Therefore, no response to those allegations is required under Federal Rule of Civil Procedure 8(b)(1). Ms. Khorram reserves all rights, including the right to seek leave to amend this response, in the event it is nevertheless determined that her response is required. In an abundance of caution, and solely to preserve all of Ms. Khorram's rights, Ms. Khorram does not intend by this response to admit any allegations and reserves the right to deny the allegations in this Paragraph or plead that she lacks knowledge or information sufficient to form a belief about the truth of such allegations.

243. Some of the allegations in this Paragraph relate to Mr. Jones' RICO claim, which the Court dismissed as to Ms. Khorram on March 24, 2025. Therefore, no response to those allegations is required under Federal Rule of Civil Procedure 8(b)(1). Ms. Khorram reserves all rights, including the right to seek leave to amend this response, in the event it is nevertheless determined that her response is required. In an abundance of caution, and solely to preserve all of Ms. Khorram's rights, Ms. Khorram does not intend by this response to admit any allegations and reserves the right to deny the allegations in this Paragraph relating to the RICO claim or

plead that she lacks knowledge or information sufficient to form a belief about the truth of such allegations. Ms. Khorram denies the remaining allegations in Paragraph 243 as they pertain to her. Ms. Khorram lacks knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 243 as they pertain to the other Defendants.

244. Some of the allegations in this Paragraph relate to Mr. Jones' RICO claim, which the Court dismissed as to Ms. Khorram on March 24, 2025. Therefore, no response to those allegations is required under Federal Rule of Civil Procedure 8(b)(1). Ms. Khorram reserves all rights, including the right to seek leave to amend this response, in the event it is nevertheless determined that her response is required. In an abundance of caution, and solely to preserve all of Ms. Khorram's rights, Ms. Khorram does not intend by this response to admit any allegations and reserves the right to deny the allegations in this Paragraph relating to the RICO claim or plead that she lacks knowledge or information sufficient to form a belief about the truth of such allegations. Ms. Khorram denies the remaining allegations in Paragraph 244 as they pertain to her. Ms. Khorram lacks knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 244 as they pertain to the other Defendants.

245. Some of the allegations in this Paragraph relate to Mr. Jones' RICO claim, which the Court dismissed as to Ms. Khorram on March 24, 2025. Therefore, no response to those allegations is required under Federal Rule of Civil Procedure 8(b)(1). Ms. Khorram reserves all rights, including the right to seek leave to amend this response, in the event it is nevertheless determined that her response is required. In an abundance of caution, and solely to preserve all of Ms. Khorram's rights, Ms. Khorram does not intend by this response to admit any allegations and reserves the right to deny the allegations in this Paragraph relating to the RICO claim or plead that she lacks knowledge or information sufficient to form a belief about the truth of such

allegations. Ms. Khorram denies the remaining allegations in Paragraph 245 as they pertain to her. Ms. Khorram lacks knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 245 as they pertain to the other Defendants.

246. Some of the allegations in this Paragraph relate to Mr. Jones' RICO claim, which the Court dismissed as to Ms. Khorram on March 24, 2025. Therefore, no response to those allegations is required under Federal Rule of Civil Procedure 8(b)(1). Ms. Khorram reserves all rights, including the right to seek leave to amend this response, in the event it is nevertheless determined that her response is required. In an abundance of caution, and solely to preserve all of Ms. Khorram's rights, Ms. Khorram does not intend by this response to admit any allegations and reserves the right to deny the allegations in this Paragraph relating to the RICO claim or plead that she lacks knowledge or information sufficient to form a belief about the truth of such allegations. Ms. Khorram denies the remaining allegations in Paragraph 246 as they pertain to her. Ms. Khorram lacks knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 246 as they pertain to the other Defendants.

247. Some of the allegations in this Paragraph relate to Mr. Jones' RICO claim, which the Court dismissed as to Ms. Khorram on March 24, 2025. Therefore, no response to those allegations is required under Federal Rule of Civil Procedure 8(b)(1). Ms. Khorram reserves all rights, including the right to seek leave to amend this response, in the event it is nevertheless determined that her response is required. In an abundance of caution, and solely to preserve all of Ms. Khorram's rights, Ms. Khorram does not intend by this response to admit any allegations and reserves the right to deny the allegations in this Paragraph relating to the RICO claim or plead that she lacks knowledge or information sufficient to form a belief about the truth of such allegations. Ms. Khorram denies the remaining allegations in Paragraph 247 as they pertain to

her. Ms. Khorram lacks knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 247 as they pertain to the other Defendants.

248. Some of the allegations in this Paragraph relate to Mr. Jones' RICO claim, which the Court dismissed as to Ms. Khorram on March 24, 2025. Therefore, no response to those allegations is required under Federal Rule of Civil Procedure 8(b)(1). Ms. Khorram reserves all rights, including the right to seek leave to amend this response, in the event it is nevertheless determined that her response is required. In an abundance of caution, and solely to preserve all of Ms. Khorram's rights, Ms. Khorram does not intend by this response to admit any allegations and reserves the right to deny the allegations in this Paragraph relating to the RICO claim or plead that she lacks knowledge or information sufficient to form a belief about the truth of such allegations. Ms. Khorram denies the remaining allegations in Paragraph 248 as they pertain to her. Ms. Khorram lacks knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 248 as they pertain to the other Defendants.

249. Some of the allegations in this Paragraph relate to Mr. Jones' RICO claim, which the Court dismissed as to Ms. Khorram on March 24, 2025. Therefore, no response to those allegations is required under Federal Rule of Civil Procedure 8(b)(1). Ms. Khorram reserves all rights, including the right to seek leave to amend this response, in the event it is nevertheless determined that her response is required. In an abundance of caution, and solely to preserve all of Ms. Khorram's rights, Ms. Khorram does not intend by this response to admit any allegations and reserves the right to deny the allegations in this Paragraph relating to the RICO claim or plead that she lacks knowledge or information sufficient to form a belief about the truth of such allegations. Ms. Khorram denies the remaining allegations in Paragraph 249 as they pertain to

her. Ms. Khorram lacks knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 249 as they pertain to the other Defendants.

250. Some of the allegations in this Paragraph relate to Mr. Jones' RICO claim, which the Court dismissed as to Ms. Khorram on March 24, 2025. Therefore, no response to those allegations is required under Federal Rule of Civil Procedure 8(b)(1). Ms. Khorram reserves all rights, including the right to seek leave to amend this response, in the event it is nevertheless determined that her response is required. In an abundance of caution, and solely to preserve all of Ms. Khorram's rights, Ms. Khorram does not intend by this response to admit any allegations and reserves the right to deny the allegations in this Paragraph relating to the RICO claim or plead that she lacks knowledge or information sufficient to form a belief about the truth of such allegations. Ms. Khorram denies the remaining allegations in Paragraph 250 as they pertain to her. Ms. Khorram lacks knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 250 as they pertain to the other Defendants.

251. Some of the allegations in this Paragraph relate to Mr. Jones' RICO claim, which the Court dismissed as to Ms. Khorram on March 24, 2025. Therefore, no response to those allegations is required under Federal Rule of Civil Procedure 8(b)(1). Ms. Khorram reserves all rights, including the right to seek leave to amend this response, in the event it is nevertheless determined that her response is required. In an abundance of caution, and solely to preserve all of Ms. Khorram's rights, Ms. Khorram does not intend by this response to admit any allegations and reserves the right to deny the allegations in this Paragraph relating to the RICO claim or plead that she lacks knowledge or information sufficient to form a belief about the truth of such allegations. Ms. Khorram denies the remaining allegations in Paragraph 251 as they pertain to

her. Ms. Khorram lacks knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 251 as they pertain to the other Defendants.

252. Some of the allegations in this Paragraph relate to Mr. Jones' RICO claim, which the Court dismissed as to Ms. Khorram on March 24, 2025. Therefore, no response to those allegations is required under Federal Rule of Civil Procedure 8(b)(1). Ms. Khorram reserves all rights, including the right to seek leave to amend this response, in the event it is nevertheless determined that her response is required. In an abundance of caution, and solely to preserve all of Ms. Khorram's rights, Ms. Khorram does not intend by this response to admit any allegations and reserves the right to deny the allegations in this Paragraph relating to the RICO claim or plead that she lacks knowledge or information sufficient to form a belief about the truth of such allegations. Ms. Khorram denies the remaining allegations in Paragraph 252 as they pertain to her. Ms. Khorram lacks knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 252 as they pertain to the other Defendants.

253. Some of the allegations in this Paragraph relate to Mr. Jones' RICO claim, which the Court dismissed as to Ms. Khorram on March 24, 2025. Therefore, no response to those allegations is required under Federal Rule of Civil Procedure 8(b)(1). Ms. Khorram reserves all rights, including the right to seek leave to amend this response, in the event it is nevertheless determined that her response is required. In an abundance of caution, and solely to preserve all of Ms. Khorram's rights, Ms. Khorram does not intend by this response to admit any allegations and reserves the right to deny the allegations in this Paragraph relating to the RICO claim or plead that she lacks knowledge or information sufficient to form a belief about the truth of such allegations. Ms. Khorram denies the remaining allegations in Paragraph 253 as they pertain to

her. Ms. Khorram lacks knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 253 as they pertain to the other Defendants.

254. Some of the allegations in this Paragraph relate to Mr. Jones' RICO claim, which the Court dismissed as to Ms. Khorram on March 24, 2025. Therefore, no response to those allegations is required under Federal Rule of Civil Procedure 8(b)(1). Ms. Khorram reserves all rights, including the right to seek leave to amend this response, in the event it is nevertheless determined that her response is required. In an abundance of caution, and solely to preserve all of Ms. Khorram's rights, Ms. Khorram does not intend by this response to admit any allegations and reserves the right to deny the allegations in this Paragraph relating to the RICO claim or plead that she lacks knowledge or information sufficient to form a belief about the truth of such allegations. Ms. Khorram denies the remaining allegations in Paragraph 254 as they pertain to her. Ms. Khorram lacks knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 254 as they pertain to the other Defendants.

255. The allegations in this Paragraph relate to Mr. Jones' RICO claim, which the Court dismissed as to Ms. Khorram on March 24, 2025. Therefore, no response to those allegations is required under Federal Rule of Civil Procedure 8(b)(1). Ms. Khorram reserves all rights, including the right to seek leave to amend this response, in the event it is nevertheless determined that her response is required. In an abundance of caution, and solely to preserve all of Ms. Khorram's rights, Ms. Khorram does not intend by this response to admit any allegations and reserves the right to deny the allegations in this Paragraph or plead that she lacks knowledge or information sufficient to form a belief about the truth of such allegations.

256. The allegations in this Paragraph relate to Mr. Jones' RICO claim, which the Court dismissed as to Ms. Khorram on March 24, 2025. Therefore, no response to those

allegations is required under Federal Rule of Civil Procedure 8(b)(1). Ms. Khorram reserves all rights, including the right to seek leave to amend this response, in the event it is nevertheless determined that her response is required. In an abundance of caution, and solely to preserve all of Ms. Khorram's rights, Ms. Khorram does not intend by this response to admit any allegations and reserves the right to deny the allegations in this Paragraph or plead that she lacks knowledge or information sufficient to form a belief about the truth of such allegations.

257. The allegations in this Paragraph relate to Mr. Jones' RICO claim, which the Court dismissed as to Ms. Khorram on March 24, 2025. Therefore, no response to those allegations is required under Federal Rule of Civil Procedure 8(b)(1). Ms. Khorram reserves all rights, including the right to seek leave to amend this response, in the event it is nevertheless determined that her response is required. In an abundance of caution, and solely to preserve all of Ms. Khorram's rights, Ms. Khorram does not intend by this response to admit any allegations and reserves the right to deny the allegations in this Paragraph or plead that she lacks knowledge or information sufficient to form a belief about the truth of such allegations.

258. The allegations in this Paragraph relate to Mr. Jones' RICO claim, which the Court dismissed as to Ms. Khorram on March 24, 2025. Therefore, no response to those allegations is required under Federal Rule of Civil Procedure 8(b)(1). Ms. Khorram reserves all rights, including the right to seek leave to amend this response, in the event it is nevertheless determined that her response is required. In an abundance of caution, and solely to preserve all of Ms. Khorram's rights, Ms. Khorram does not intend by this response to admit any allegations and reserves the right to deny the allegations in this Paragraph or plead that she lacks knowledge or information sufficient to form a belief about the truth of such allegations.

259. The allegations in this Paragraph relate to Mr. Jones' RICO claim, which the Court dismissed as to Ms. Khorram on March 24, 2025. Therefore, no response to those allegations is required under Federal Rule of Civil Procedure 8(b)(1). Ms. Khorram reserves all rights, including the right to seek leave to amend this response, in the event it is nevertheless determined that her response is required. In an abundance of caution, and solely to preserve all of Ms. Khorram's rights, Ms. Khorram does not intend by this response to admit any allegations and reserves the right to deny the allegations in this Paragraph or plead that she lacks knowledge or information sufficient to form a belief about the truth of such allegations.

260. The allegations in this Paragraph relate to Mr. Jones' RICO claim, which the Court dismissed as to Ms. Khorram on March 24, 2025. Therefore, no response to those allegations is required under Federal Rule of Civil Procedure 8(b)(1). Ms. Khorram reserves all rights, including the right to seek leave to amend this response, in the event it is nevertheless determined that her response is required. In an abundance of caution, and solely to preserve all of Ms. Khorram's rights, Ms. Khorram does not intend by this response to admit any allegations and reserves the right to deny the allegations in this Paragraph or plead that she lacks knowledge or information sufficient to form a belief about the truth of such allegations.

261. The allegations in this Paragraph relate to Mr. Jones' RICO claim, which the Court dismissed as to Ms. Khorram on March 24, 2025. Therefore, no response to those allegations is required under Federal Rule of Civil Procedure 8(b)(1). Ms. Khorram reserves all rights, including the right to seek leave to amend this response, in the event it is nevertheless determined that her response is required. In an abundance of caution, and solely to preserve all of Ms. Khorram's rights, Ms. Khorram does not intend by this response to admit any allegations

and reserves the right to deny the allegations in this Paragraph or plead that she lacks knowledge or information sufficient to form a belief about the truth of such allegations.

262. The allegations in this Paragraph relate to Mr. Jones' RICO claim, which the Court dismissed as to Ms. Khorram on March 24, 2025. Therefore, no response to those allegations is required under Federal Rule of Civil Procedure 8(b)(1). Ms. Khorram reserves all rights, including the right to seek leave to amend this response, in the event it is nevertheless determined that her response is required. In an abundance of caution, and solely to preserve all of Ms. Khorram's rights, Ms. Khorram does not intend by this response to admit any allegations and reserves the right to deny the allegations in this Paragraph or plead that she lacks knowledge or information sufficient to form a belief about the truth of such allegations.

263. The allegations in this Paragraph relate to Mr. Jones' RICO claim, which the Court dismissed as to Ms. Khorram on March 24, 2025. Therefore, no response to those allegations is required under Federal Rule of Civil Procedure 8(b)(1). Ms. Khorram reserves all rights, including the right to seek leave to amend this response, in the event it is nevertheless determined that her response is required. In an abundance of caution, and solely to preserve all of Ms. Khorram's rights, Ms. Khorram does not intend by this response to admit any allegations and reserves the right to deny the allegations in this Paragraph or plead that she lacks knowledge or information sufficient to form a belief about the truth of such allegations.

264. The allegations in this Paragraph relate to Mr. Jones' RICO claim, which the Court dismissed as to Ms. Khorram on March 24, 2025. Therefore, no response to those allegations is required under Federal Rule of Civil Procedure 8(b)(1). Ms. Khorram reserves all rights, including the right to seek leave to amend this response, in the event it is nevertheless determined that her response is required. In an abundance of caution, and solely to preserve all

of Ms. Khorram's rights, Ms. Khorram does not intend by this response to admit any allegations and reserves the right to deny the allegations in this Paragraph or plead that she lacks knowledge or information sufficient to form a belief about the truth of such allegations.

265. The allegations in this Paragraph relate to Mr. Jones' RICO claim, which the Court dismissed as to Ms. Khorram on March 24, 2025. Therefore, no response to those allegations is required under Federal Rule of Civil Procedure 8(b)(1). Ms. Khorram reserves all rights, including the right to seek leave to amend this response, in the event it is nevertheless determined that her response is required. In an abundance of caution, and solely to preserve all of Ms. Khorram's rights, Ms. Khorram does not intend by this response to admit any allegations and reserves the right to deny the allegations in this Paragraph or plead that she lacks knowledge or information sufficient to form a belief about the truth of such allegations.

266. The allegations in this Paragraph relate to Mr. Jones' RICO claim, which the Court dismissed as to Ms. Khorram on March 24, 2025. Therefore, no response to those allegations is required under Federal Rule of Civil Procedure 8(b)(1). Ms. Khorram reserves all rights, including the right to seek leave to amend this response, in the event it is nevertheless determined that her response is required. In an abundance of caution, and solely to preserve all of Ms. Khorram's rights, Ms. Khorram does not intend by this response to admit any allegations and reserves the right to deny the allegations in this Paragraph or plead that she lacks knowledge or information sufficient to form a belief about the truth of such allegations.

267. The allegations in this Paragraph relate to Mr. Jones' RICO claim, which the Court dismissed as to Ms. Khorram on March 24, 2025. Therefore, no response to those allegations is required under Federal Rule of Civil Procedure 8(b)(1). Ms. Khorram reserves all rights, including the right to seek leave to amend this response, in the event it is nevertheless

determined that her response is required. In an abundance of caution, and solely to preserve all of Ms. Khorram's rights, Ms. Khorram does not intend by this response to admit any allegations and reserves the right to deny the allegations in this Paragraph or plead that she lacks knowledge or information sufficient to form a belief about the truth of such allegations.

268. The allegations in this Paragraph relate to Mr. Jones' RICO claim, which the Court dismissed as to Ms. Khorram on March 24, 2025. Therefore, no response to those allegations is required under Federal Rule of Civil Procedure 8(b)(1). Ms. Khorram reserves all rights, including the right to seek leave to amend this response, in the event it is nevertheless determined that her response is required. In an abundance of caution, and solely to preserve all of Ms. Khorram's rights, Ms. Khorram does not intend by this response to admit any allegations and reserves the right to deny the allegations in this Paragraph or plead that she lacks knowledge or information sufficient to form a belief about the truth of such allegations.

269. The allegations in this Paragraph relate to Mr. Jones' RICO claim, which the Court dismissed as to Ms. Khorram on March 24, 2025. Therefore, no response to those allegations is required under Federal Rule of Civil Procedure 8(b)(1). Ms. Khorram reserves all rights, including the right to seek leave to amend this response, in the event it is nevertheless determined that her response is required. In an abundance of caution, and solely to preserve all of Ms. Khorram's rights, Ms. Khorram does not intend by this response to admit any allegations and reserves the right to deny the allegations in this Paragraph or plead that she lacks knowledge or information sufficient to form a belief about the truth of such allegations.

270. Some of the allegations in this Paragraph relate to Mr. Jones' RICO claim, which the Court dismissed as to Ms. Khorram on March 24, 2025. Therefore, no response to those allegations is required under Federal Rule of Civil Procedure 8(b)(1). Ms. Khorram reserves all

rights, including the right to seek leave to amend this response, in the event it is nevertheless determined that her response is required. In an abundance of caution, and solely to preserve all of Ms. Khorram's rights, Ms. Khorram does not intend by this response to admit any allegations and reserves the right to deny the allegations in this Paragraph relating to the RICO claim or plead that she lacks knowledge or information sufficient to form a belief about the truth of such allegations. Ms. Khorram denies the remaining allegations in Paragraph 270 as they pertain to her. Ms. Khorram lacks knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 270 as they pertain to the other Defendants.

271. Some of the allegations in this Paragraph relate to Mr. Jones' RICO claim, which the Court dismissed as to Ms. Khorram on March 24, 2025. Therefore, no response to those allegations is required under Federal Rule of Civil Procedure 8(b)(1). Ms. Khorram reserves all rights, including the right to seek leave to amend this response, in the event it is nevertheless determined that her response is required. In an abundance of caution, and solely to preserve all of Ms. Khorram's rights, Ms. Khorram does not intend by this response to admit any allegations and reserves the right to deny the allegations in this Paragraph relating to the RICO claim or plead that she lacks knowledge or information sufficient to form a belief about the truth of such allegations. Ms. Khorram denies the remaining allegations in Paragraph 271 as they pertain to her. Ms. Khorram lacks knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 271 as they pertain to the other Defendants.

272. The allegations in this Paragraph relate to Mr. Jones' RICO claim, which the Court dismissed as to Ms. Khorram on March 24, 2025. Therefore, no response to those allegations is required under Federal Rule of Civil Procedure 8(b)(1). Ms. Khorram reserves all rights, including the right to seek leave to amend this response, in the event it is nevertheless

determined that her response is required. In an abundance of caution, and solely to preserve all of Ms. Khorram's rights, Ms. Khorram does not intend by this response to admit any allegations and reserves the right to deny the allegations in this Paragraph or plead that she lacks knowledge or information sufficient to form a belief about the truth of such allegations.

273. The allegations in this Paragraph relate to Mr. Jones' RICO claim, which the Court dismissed as to Ms. Khorram on March 24, 2025. Therefore, no response to those allegations is required under Federal Rule of Civil Procedure 8(b)(1). Ms. Khorram reserves all rights, including the right to seek leave to amend this response, in the event it is nevertheless determined that her response is required. In an abundance of caution, and solely to preserve all of Ms. Khorram's rights, Ms. Khorram does not intend by this response to admit any allegations and reserves the right to deny the allegations in this Paragraph or plead that she lacks knowledge or information sufficient to form a belief about the truth of such allegations.

274. The allegations in this Paragraph relate to Mr. Jones' RICO claim, which the Court dismissed as to Ms. Khorram on March 24, 2025. Therefore, no response to those allegations is required under Federal Rule of Civil Procedure 8(b)(1). Ms. Khorram reserves all rights, including the right to seek leave to amend this response, in the event it is nevertheless determined that her response is required. In an abundance of caution, and solely to preserve all of Ms. Khorram's rights, Ms. Khorram does not intend by this response to admit any allegations and reserves the right to deny the allegations in this Paragraph or plead that she lacks knowledge or information sufficient to form a belief about the truth of such allegations.

275. The allegations in this Paragraph relate to Mr. Jones' RICO claim, which the Court dismissed as to Ms. Khorram on March 24, 2025. Therefore, no response to those allegations is required under Federal Rule of Civil Procedure 8(b)(1). Ms. Khorram reserves all

rights, including the right to seek leave to amend this response, in the event it is nevertheless determined that her response is required. In an abundance of caution, and solely to preserve all of Ms. Khorram's rights, Ms. Khorram does not intend by this response to admit any allegations and reserves the right to deny the allegations in this Paragraph or plead that she lacks knowledge or information sufficient to form a belief about the truth of such allegations.

276. The allegations in this Paragraph (and the requests for relief in the accompanying "WHEREFORE" clause and subparagraphs (a)-(d)) relate to Mr. Jones' RICO claim, which the Court dismissed as to Ms. Khorram on March 24, 2025. Therefore, no response to those allegations is required under Federal Rule of Civil Procedure 8(b)(1). Ms. Khorram reserves all rights, including the right to seek leave to amend this response, in the event it is nevertheless determined that her response is required. In an abundance of caution, and solely to preserve all of Ms. Khorram's rights, Ms. Khorram does not intend by this response to admit any allegations and reserves the right to deny the allegations in this Paragraph or plead that she lacks knowledge or information sufficient to form a belief about the truth of such allegations.

277. Ms. Khorram incorporates her responses in each of the preceding paragraphs of this Answer.

278. This claim for relief and the allegations in this Paragraph are not asserted against Mr. Khorram. Therefore, no response is required under Federal Rule of Civil Procedure 8(b)(1). Ms. Khorram reserves all rights, including the right to seek leave to amend this response, in the event it is nevertheless determined that her response is required. In an abundance of caution, and solely to preserve all of Ms. Khorram's rights, Ms. Khorram does not intend by this response to admit any allegations and reserves the right to deny the allegations in this Paragraph or plead that she lacks knowledge or information sufficient to form a belief about the truth of the allegations.

279. This claim for relief and the allegations in this Paragraph are not asserted against Mr. Khorram. Therefore, no response is required under Federal Rule of Civil Procedure 8(b)(1). Ms. Khorram reserves all rights, including the right to seek leave to amend this response, in the event it is nevertheless determined that her response is required. In an abundance of caution, and solely to preserve all of Ms. Khorram's rights, Ms. Khorram does not intend by this response to admit any allegations and reserves the right to deny the allegations in this Paragraph or plead that she lacks knowledge or information sufficient to form a belief about the truth of the allegations.

280. This claim for relief and the allegations in this Paragraph are not asserted against Mr. Khorram. Therefore, no response is required under Federal Rule of Civil Procedure 8(b)(1). Ms. Khorram reserves all rights, including the right to seek leave to amend this response, in the event it is nevertheless determined that her response is required. In an abundance of caution, and solely to preserve all of Ms. Khorram's rights, Ms. Khorram does not intend by this response to admit any allegations and reserves the right to deny the allegations in this Paragraph or plead that she lacks knowledge or information sufficient to form a belief about the truth of the allegations.

281. This claim for relief and the allegations in this Paragraph are not asserted against Mr. Khorram. Therefore, no response is required under Federal Rule of Civil Procedure 8(b)(1). Ms. Khorram reserves all rights, including the right to seek leave to amend this response, in the event it is nevertheless determined that her response is required. In an abundance of caution, and solely to preserve all of Ms. Khorram's rights, Ms. Khorram does not intend by this response to admit any allegations and reserves the right to deny the allegations in this Paragraph or plead that she lacks knowledge or information sufficient to form a belief about the truth of the allegations.

282. This claim for relief and the allegations in this Paragraph are not asserted against Mr. Khorram. Therefore, no response is required under Federal Rule of Civil Procedure 8(b)(1).

Ms. Khorram reserves all rights, including the right to seek leave to amend this response, in the event it is nevertheless determined that her response is required. In an abundance of caution, and solely to preserve all of Ms. Khorram's rights, Ms. Khorram does not intend by this response to admit any allegations and reserves the right to deny the allegations in this Paragraph or plead that she lacks knowledge or information sufficient to form a belief about the truth of the allegations.

283. Ms. Khorram incorporates her responses in each of the preceding paragraphs of this Answer.

284. This claim for relief and the allegations in this Paragraph are not asserted against Mr. Khorram. Therefore, no response is required under Federal Rule of Civil Procedure 8(b)(1). Ms. Khorram reserves all rights, including the right to seek leave to amend this response, in the event it is nevertheless determined that her response is required. In an abundance of caution, and solely to preserve all of Ms. Khorram's rights, Ms. Khorram does not intend by this response to admit any allegations and reserves the right to deny the allegations in this Paragraph or plead that she lacks knowledge or information sufficient to form a belief about the truth of the allegations.

285. This claim for relief and the allegations in this Paragraph are not asserted against Mr. Khorram. Therefore, no response is required under Federal Rule of Civil Procedure 8(b)(1). Ms. Khorram reserves all rights, including the right to seek leave to amend this response, in the event it is nevertheless determined that her response is required. In an abundance of caution, and solely to preserve all of Ms. Khorram's rights, Ms. Khorram does not intend by this response to admit any allegations and reserves the right to deny the allegations in this Paragraph or plead that she lacks knowledge or information sufficient to form a belief about the truth of the allegations.

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298. Ms. Khorram incorporates her responses in each of the preceding paragraphs of this Answer.

299. Ms. Khorram denies the allegations in Paragraph 299 as they pertain to her. Ms. Khorram lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 299 as they pertain to the other Defendants.

300. Ms. Khorram denies the allegations in Paragraph 300 as they pertain to her. Ms. Khorram lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 300 as they pertain to the other Defendants.

301. Ms. Khorram denies the allegations in Paragraph 301 as they pertain to her. Ms. Khorram lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 301 as they pertain to the other Defendants.

302. Ms. Khorram denies the allegations in Paragraph 302 as they pertain to her. Ms. Khorram lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 302 as they pertain to the other Defendants.

303. Ms. Khorram denies the allegations in Paragraph 303 as they pertain to her. Ms. Khorram lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 303 as they pertain to the other Defendants.

304. Ms. Khorram denies the allegations in Paragraph 304 as they pertain to her. Ms. Khorram lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 304 as they pertain to the other Defendants.

305. Ms. Khorram denies the allegations in Paragraph 305 as they pertain to her. Ms. Khorram lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 305 as they pertain to the other Defendants.

306. Ms. Khorram denies the allegations in Paragraph 306 as they pertain to her. Ms. Khorram lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 306 as they pertain to the other Defendants.

307. Ms. Khorram denies the allegations in Paragraph 307 as they pertain to her. Ms. Khorram lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 307 as they pertain to the other Defendants.

308. Ms. Khorram denies the allegations in Paragraph 308 as they pertain to her. Ms. Khorram lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 308 as they pertain to the other Defendants.

309. Ms. Khorram denies the allegations in Paragraph 309 as they pertain to her. Ms. Khorram lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 309 as they pertain to the other Defendants.

310. Ms. Khorram denies the allegations in Paragraph 310 as they pertain to her. Ms. Khorram lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 310 as they pertain to the other Defendants.

311. Ms. Khorram denies the allegations in Paragraph 311 as they pertain to her. Ms. Khorram lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 311 as they pertain to the other Defendants.

312. Ms. Khorram denies the allegations in Paragraph 312 as they pertain to her. Ms. Khorram lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 312 as they pertain to the other Defendants.

313. Ms. Khorram denies the allegations in Paragraph 313 as they pertain to her. Ms. Khorram lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 313 as they pertain to the other Defendants.

314. This claim for relief and the allegations in this Paragraph are not asserted against Mr. Khorram. Therefore, no response is required under Federal Rule of Civil Procedure 8(b)(1). Ms. Khorram reserves all rights, including the right to seek leave to amend this response, in the event it is nevertheless determined that her response is required. In an abundance of caution, and solely to preserve all of Ms. Khorram's rights, Ms. Khorram does not intend by this response to admit any allegations and reserves the right to deny the allegations in this Paragraph or plead that she lacks knowledge or information sufficient to form a belief about the truth of the allegations.

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RELIEF REQUESTED

Ms. Khorram denies that Mr. Jones is entitled to the relief requested in the "WHEREFORE" clause of the Second Amended Complaint, and sub-paragraphs (a) – (g) thereunder.

AFFIRMATIVE DEFENSES

Ms. Khorram alleges the affirmative defenses set forth below. By such pleading, Ms. Khorram does not waive, excuse, or alter the burden of proof and/or burden of going forward with the evidence that otherwise exists with respect to any particular issue of law or in equity. Furthermore, all affirmative defenses are pled in the alternative, and do not constitute an admission of liability or an admission as to whether Mr. Jones is entitled to any relief whatsoever. Ms. Khorram also does not waive any affirmative defenses and reserves the right to assert any and all affirmative defenses that may be available after reasonable discovery.

FIRST AFFIRMATIVE DEFENSE

1. The Second Amended Complaint fails to state facts sufficient to constitute a cause of action against Ms. Khorram.

SECOND AFFIRMATIVE DEFENSE

2. Mr. Jones voluntarily engaged in or otherwise consented to the alleged conduct at issue.

THIRD AFFIRMATIVE DEFENSE

3. Mr. Jones' remaining claim against Ms. Khorram is barred, in whole or in part, by the doctrine of *in pari delicto*, as Mr. Jones was equally or more responsible for the alleged conduct at issue.

FOURTH AFFIRMATIVE DEFENSE

4. Mr. Jones' remaining claim against Ms. Khorram is barred, in whole or in part, by the statute of limitations.

FIFTH AFFIRMATIVE DEFENSE

5. Mr. Jones' remaining claim against Ms. Khorram is barred, in whole or in part, by the doctrine of latches.

DEMAND FOR A JURY TRIAL

Ms. Khorram demands a jury trial.

WHEREFORE, Ms. Khorram prays for relief as follows:

1. That the Second Amended Complaint be dismissed, with prejudice and in its entirety as to Ms. Khorram;
2. That Mr. Jones take nothing by reason of this Second Amended Complaint as to Ms. Khorram and that judgment be entered against Mr. Jones and in favor of Ms. Khorram;
3. That Ms. Khorram be awarded her attorney's fees and costs incurred in defending against this frivolous and vexatious action as asserted against her; and

4. That Ms. Khorram be granted such other and further relief as the Court may deem just and proper.

DATED: April 7, 2025

By: /s/ Reuven L. Cohen
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